

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**THIS DOCUMENT RELATES TO:**  
*Cortney Hook et al. v. Zhejiang Huahai  
Pharmaceutical Co. Ltd., et al.,*

Case No. 1:20-cv-06547-RMB-SAK

MDL No. 2875

Honorable Renée Marie Bumb  
District Court Judge

**NOTICE OF VIDEOTAPED  
DEPOSITION OF PLAINTIFF CYNTHIA SUITS**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure, the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 – ECF No. 632), and the Case Management Schedule for the Second Wave of Potential Personal Injury Bellwether Plaintiff Trials (filed March 12, 2025 – ECF No. 2988), Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai US, Inc., Solco Healthcare U.S., LLC, and Princeton Pharmaceutical Inc. (the “ZHP Defendants”) and Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. (the “Teva Defendants”) will take the deposition upon oral examination of **Cynthia Suits, on April 30, 2025**, beginning at **10:00 a.m. EDT**, and continuing until completion, at **Hampton Inn by Hilton Blue Ridge, 50**

**W. Main Street, Blue Ridge, GA 30513.** Counsel who wish to attend remotely will have the option to do so using audio-visual conference technology and should notify the attorney contact for the deposition listed below to arrange for login credentials to be sent to them prior to the deposition. The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The deponent is directed to bring to the deposition the items listed in the attached “**Exhibit A.**”

The attorney contact for the deposition is:

Victoria Langton  
3333 Piedmont Rd. NE, Suite 2500  
Atlanta, GA 30326  
(678) 553-7392  
[langtont@gtlaw.com](mailto:langtont@gtlaw.com)

Dated: April 24, 2025

Respectfully submitted,

/s/ Victoria Langton  
Victoria Langton  
(GA State Bar No. 444119)  
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*Attorney for Teva Pharmaceuticals  
USA, Inc., Teva Pharmaceutical  
Industries Ltd., Actavis LLC, and  
Actavis Pharma, Inc.*

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*Attorneys for Defendants Zhejiang  
Huahai Pharmaceutical Co., Ltd.,  
Huahai US, Inc., Solco Healthcare  
U.S., LLC, and Princeton  
Pharmaceutical Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 24, 2025, a true and correct copy of the foregoing Notice of Videotaped Deposition of **Plaintiff Cynthia Suits** was served upon the below counsel of record by e-mail:

**Matthew Morrison**

Harrison Davis Morrison Jones, P.C.  
5 Ritchie Road  
Waco, TX 76712  
Phone: (254) 761-3300  
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*Attorney for Plaintiff Courtney Hook*

Dated: April 24, 2025

Respectfully submitted,

/s/ Victoria Langton

Victoria Langton  
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*Attorney for Teva Pharmaceuticals USA,  
Inc., Teva Pharmaceutical Industries Ltd.,  
Actavis LLC, and Actavis Pharma, Inc.*

**EXHIBIT A**

**DEFINITIONS**

1. “Person” as used in these Requests means all-natural persons, corporations, partnerships, trusts, or other associations, and all other entities.
2. “You” and “your” as used in these Requests means **Cynthia Suits**, and her representatives, administrative or personal assistants, agents, legal representatives, employees, and all other persons acting on her behalf or under her direction or supervision.
3. “Teva Defendants” shall be deemed to include, but without limitation, Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc., and each of its employees, agents, officers, directors, representatives, consultants, accountants, and attorneys, including any person who served in any such capacity at any time.
4. “ZHP Defendants” shall be deemed to include, but without limitation, Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai US, Inc., Solco Healthcare U.S., LLC, and Princeton Pharmaceutical Inc., and each of its employees, agents, officers, directors, representatives, consultants, accountants, and attorneys, including any person who served in any such capacity at any time.
5. The term “VCD” shall refer to the valsartan containing drug products that are the subject of this Case.
6. “Communication” means and includes any and all direct or indirect transmissions of information by any means, written, oral or otherwise.
7. “Correspondence” means and includes all letters, notes, e-mails, text messages, memoranda or other written, typewritten, printed or reproduced material.
8. “Document” as used in these Requests includes without limitation, all written, printed, typed, photostatic, photographed, recorded, telecopied, photocopied or graphic materials of any kind, whether comprised of letters, words, numbers, pictures, sounds or symbols or any combination thereof. Without limiting the generality of the foregoing, the term “Document” includes without limitation, any book, pamphlet, binder, periodical, letter, email, text message, blog, memorandum, telegram, telex, report, envelope, intraoffice or interoffice communication, handwritten or other notes, working papers, transcription, draft,

account, ledger, chart, paper, study, survey, index, tape, disc, photograph, computer printout, computer program and data files, microfilm, microfiche, correspondence, mailers, ledger cards, business cards, diaries, calendars, address and telephone records, drawings and charts and other data compilations. The term “other data compilations” includes information stored in, or accessible through, computer or other information retrieval systems, whether or not in hard copy form, together with instructions and all other materials necessary to use or interpret such data compilations. If more than one copy of any document exists, and if as a result of handwritten additions and notations, or for any other reason, the copies are not identical, each non-identical copy is a separate document and should be separately identified.

9. “Identify” as used with reference to a person shall mean to provide the name, present or last known address, telephone number or email address, and present or last known place of employment of the person. “Identify” as used with respect to Documents shall mean to provide the type, general subject matter, date, author, addressee, and recipient of the Document. “Identify” as used with reference to a communication, shall mean to state the date, names of participants, and nature of the communication (e.g., personal meeting or telephone call).
10. “Related to” or “relating to” shall mean directly or indirectly embodying, mentioning, or describing, pertaining to, referring to, consisting of, being connected with or reflecting upon a stated subject matter.
11. “And” means “and/or” and “or” means “and/or.” The plural of any word used herein includes the singular and the singular includes the plural. The masculine gender of any word used here includes the feminine. The past tense of a verb used herein includes the present tense, and the present tense includes the past tense.

## **REQUESTS**

1. Any materials you have collected at any time regarding (a) Teva Defendants, (b) ZHP Defendants, or (c) the healthcare provider(s) who prescribed James Suits VCD. Such materials include, but are not limited to, any internet articles or information, journal articles, other periodicals, textbooks, or any other research materials, including personal notes.
2. All of James Suits' medical records, billing records, pathology records, and x-ray films within your possession, custody, and control or received at any time by you.
3. All non-privileged documents created by or for James Suits related to and/or summarizing James Suits' medical history that has been provided to any healthcare provider, physician, and/or hospitals.
4. All non-privileged correspondence and documents reflecting communications with any attorney, healthcare provider, researcher, or scientist, relating to VCD generally or James Suits' VCD.
5. All correspondence either sent to or received by you from healthcare providers that in any way relate to James Suits or this litigation.
6. All letters written on James Suits' behalf by healthcare provider(s) and maintained by you.
7. All email, calendars, appointment books, diaries, videos, notes, blogs, social media posts, internet websites, webpages, forums, chat rooms, chat board, support boards, message boards, sounding boards, or journals created by you that are related to or describe James Suits' medical condition, any allegations or claim in this lawsuit, VCD, the Teva Defendant, the ZHP Defendants or any of its representatives, your and James Suits' daily activities, including but not limited to social, physical, leisure, and travel activities, and James Suits' care and treatment.
8. All social media entries or postings, including but not limited to twitter, Instagram, snapchat, Facebook, google chat, or similar type accounts, maintained by you related to any allegations and claims in this lawsuit, VCD, the Teva Defendants, the ZHP Defendants, or any of its representatives, your

and James Suits' daily activities, including but not limited to social, physical, leisure, and travel activities, and James Suits' care and treatment.

9. All materials, literature, internet articles or information, journal articles, textbooks, brochures, advertisements, promotional materials letters, e-mails, blogs, Facebook posts, tweets, newsletters, social media posts, and other documents that you have reviewed, sent, or received at any time and from any source that relate to your lawsuit, VCD, the Teva Defendants, or the ZHP Defendants.
10. All written or recorded statements made by you or James Suits regarding Teva Defendants, ZHP Defendants, VCD, and/or the healthcare provider(s) who prescribed James Suits VCD.
11. All non-privileged documents in your possession, custody, or control that are related to claims in this lawsuit against Teva Defendants and ZHP Defendants.
12. All non-privileged documents reviewed by you in preparation for this deposition.
13. All documents maintained by you related to any workers' compensation, social security administration, or disability claims filed on James Suits' behalf including but not limited to any transcripts within the last 10 years.
14. All medical bills and any other documents related to your claimed damages.
15. All non-privileged documents in your possession, custody, or control that relate to your assignment or sale of any interest in proceeds that may be recovered on your behalf, regardless of the source, as the result of any compromise, settlement, arbitration, mediation, litigation, award, judgment or verdict, or any other collection activities on your pending claims in this litigation.
16. All non-privileged documents in your possession, custody, or control that are related to any third party's efforts to help manage James Suits' care, schedule James Suits' medical appointments, connect you or James Suits with medical providers or medical funding companies, or introduce you or James Suits to legal counsel in connection with this litigation.
17. Produce any and all Documents or other materials that support or relate to the information provided by You in the Short Form Complaint.

18. Produce any and all Documents that support or relate to the information provided or allegations made by You in the Short Form Complaint.
19. Produce any and all Documents that relate to Your divorce from James Suits, including the divorce decree.